Production Pursuant to Court Order #1015, Civil Action No. 99-CV-2496

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January 10, 1996

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1995-1996 PHILIP MORRIS DOCUMENT COLLECTION

SCOPE STATEMENT

Due to the requirements of present and anticipated smoking and health litigation, Philip Morris has decided to conduct a collection of documents that may be needed for litigation purposes.

The sole purpose of this Scope Statement, and the use of any terms, explanations, definitions or examples used herein, is to assist in the collection of documents. Such terms, explanations and definitions take into account plaintiffs' claims and definitions of the identified terms. Accordingly, nothing contained in this Scope Statement should be construed as an admission or even a reflection of how Philip Morris internally defines or explains the terms used herein. Nor should anything contained herein be construed as a statement concerning the relevance or responsiveness of any document or group of documents to any particular case or discovery request.

If there is any doubt as to whether a document is within collection scope, it should be collected. If large quantities of documents pertaining to specific subjects are discovered, especially if of a repetitive and routine nature, consideration should be given to collecting representative samples and information necessary to a decision about methods to be used for

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collection and production, including the location and estimated volume of such documents.

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DEFINITIONS

For purposes of this Scope Statement only, the following terms are defined as follows:

1. "Addiction" - The term "addiction" should be read broadly to include dependence, habituation and comparisons of nicotine to dependence-producing drugs. "Addiction" includes a condition of physiological or psychological dependence on a substance, characterized by unpleasant reactions upon withdrawal of the substance and tolerance to the substance, as identified by increasing resistance to the usual effects of the substance due to continued use.

2. Additive - Includes any substance added to tobacco, cigarettes or cigarette components. Examples of types of additives include flavors, preservatives, humectants, conditioning agents, and burn retardants.

3. Document - Includes all writings, drawings, graphs, charts, photographs, phonorecords, books, and other data compilations from which information can be obtained. The definition of "document" is not limited to particular media and

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includes, for example, information contained on paper or microfilm and electronically or magnetically stored information.

4. Environmental Tobacco Smoke (ETS) - ETS is an aged and diluted mixture of sidestream smoke (SS), which is smoke given off the end of a burning cigarette in between puffs, and the smoke exhaled by a smoker after inhaling mainstream smoke. Sidestream smoke and exhaled smoke are both elements of ETS. ETS research includes analysis or testing of sidestream smoke and measurement of smoke/component concentrations in enclosed areas. The terms passive smoking, public smoking, sidestream smoke, secondhand smoke, exhaled smoke and indoor air quality are all related to ETS issues.

5. "Safer Cigarette" - Includes any product modification designed to alter the levels, yields or claimed effects of tar, nicotine, and/or smoke components in tobacco, mainstream smoke or sidestream smoke. This includes, but is not limited to, research or other efforts to reduce nicotine levels or yields, reduce sidestream smoke, develop nonconventional cigarettes, and develop product modifications designed to lower the biological activity of cigarette smoke.

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6. Ignition Propensity - This term refers to the risks of cigarette-related fires. Documents concerning ignition propensity include, but are not limited to, research and other efforts to develop a cigarette with a reduced risk of causing fires, research and other efforts to develop test methods to measure ignition propensity, and legislative activities regarding reduced ignition propensity cigarettes.

7. Smoking and Health - Includes the alleged relationship between cigarette smoking and the diseases or conditions associated with the inhalation of or exposure to cigarette smoke, ETS or sidestream smoke, and the physiological and pharmacological effects of nicotine. For purposes of this Scope Statement only, the following are some of the topics included in the category of smoking and health:

Biological testing in vitro or in vivo of smoke or its components, condensate or cigarette additives
Analytical research on smoke components associated with adverse health effects
Environmental tobacco smoke
Epidemiological studies
Deliveries of tar, nicotine or smoke components if associated with adverse health effects
Product modifications to change deliveries, smoke chemistry or sidestream smoke
Human smoking behavior
Electrophysiological testing involving smoke or its components
Nicotine physiology or pharmacology
Nicotine analog research and development
"Safer cigarette" research and development
Pesticide residues, if associated with adverse health effects
Nonconventional cigarettes

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"Addiction" research
Ignition propensity

8. Advertising, Marketing and Promotion of Cigarettes

The phrase "advertising, marketing and promotion of cigarettes" should be interpreted broadly to include activities by public relations or public affairs personnel directed to smoking and health issues or to the promotion of particular cigarette brands. It does not include public relations or public affairs activities that promote the name or image of Philip Morris generally.

DOCUMENTS SUBJECT TO COLLECTION

I. CORPORATE ISSUES

A. Corporate

1. Philip Morris organization charts.

2. Documents concerning communications by Philip Morris, lobbyists or others with any federal, state or local governmental body or agency on issues of smoking and health or advertising, marketing and promotion of cigarettes. This covers, for example, product liability reform, Surgeon General activities, activities of the Federal Trade Commission concerning cigarette

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advertising, state or local government activities relating to clean air/smoking bans, and youth smoking. This also covers communications among Philip Morris, lobbyists and other businesses, organizations or groups for the purpose of petitioning any governmental body or agency concerning issues of smoking and health or the advertising, marketing and promotion of cigarettes.

3. Documents concerning communications with the United States Department of Justice, Antitrust Division, regarding activity in the tobacco industry, excluding any Hart Scott Rodino filings and supporting documents (approval process for certain corporate mergers and acquisitions).

4. Documents concerning (1) any proposed joint venture, partnership or association with any other tobacco company or companies; or (2) antitrust issues that might arise or have arisen in connection with any tobacco company's or the tobacco industry's activities in the areas of smoking and health research, product development, cigarette manufacture, or the advertising, marketing and promotion of cigarettes.

5. Documents concerning the economic contribution of tobacco to society. This includes, for example, revenues received by any governmental body (federal, state or local) generated by

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excise taxes, license fees, business and occupation taxes, and sales taxes or any other tax arising out of tobacco cultivation. This also includes documents concerning the economic contribution of tobacco to society arising from the sale of raw tobacco, the manufacture of tobacco products, and the wholesale or retail distribution or tobacco products.

6. Documents concerning Philip Morris or industry compliance with requirements or anticipated requirements of governmental bodies or regulatory agencies regarding smoking and health and/or the advertising, marketing and promotion of cigarettes.

7. Documents concerning corporate diversification, divestiture or restructuring in view of smoking and health issues.

8. Indices, card catalogs, literature searches or other listings or summaries of Philip Morris collections of publications regarding smoking and health.

9. Documents concerning consumer expectations or beliefs regarding smoking and health and smoking behavior.

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B. Document Retention

1. Documents concerning Philip Morris records retention policies, records retention manuals or any other documents concerning records retention, including any documents reflecting changes to or suggested changes to retention policies or manuals. Included are documents concerning the transfer or destruction of original documents regarding smoking and health; the advertising, marketing, or promotion of cigarettes or manufacturing. This includes documents concerning the transfer of documents from the company to either a corporate affiliate or to a third-party for any purpose including, but not limited to, storage, indexing or destruction.

C. General Smoking and Health

1. Documents concerning the social, economic or health care costs allegedly associated with cigarette smoking. This includes, but is not limited to, documents concerning health insurance rates for smokers and non-smokers.

2. Documents concerning the tobacco industry's or Philip Morris' public and/or internal positions or policies on smoking and health. This includes, but is not limited to, Philip

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Morris' position that smoking has not been proven to cause disease or that smoking or nicotine is not "addictive."

3. Documents concerning the tobacco industry's or Philip Morris' agreements, decisions, directives, discussions or recommendations concerning the release, withholding or suppression of information regarding smoking and health issues to the public or to any governmental body or agency.

4. Documents concerning Philip Morris' or tobacco industry public statements concerning smoking and health issues, such as speeches and press releases, Philip Morris publications (both internal and external), newsletters, position papers, background papers and Congressional testimony. This includes statements made by Philip Morris, other industry members, TI and CTR.

5. Documents concerning health or other benefits of smoking to smokers.

II. RESEARCH AND DEVELOPMENT

The scope of collection for the subjects in the paragraphs below includes documents concerning smoking and health

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related cigarette specifications or modifications from initial conceptualization and product development (including but not limited to development of cigarette components) through marketing. This collection is not limited to research conducted, sponsored or contracted for by Philip Morris. Collect documents concerning research proposals, whether or not undertaken, and research by any other individual or organization. Include documents concerning Special Accounts research. Include patents and patent applications owned or licensed by Philip Morris, whether filed in the U.S. or another country. Collect research on all experimental cigarettes and prototypes. Collect documents concerning conferences, meetings or symposia concerning smoking and health issues.

A. Documents concerning the biological activity and/or biological testing of tobacco and its components, tobacco smoke (mainstream or sidestream) and its components, ETS or cigarette additives or smoke condensate. This includes such research as inhalation studies, ciliastasis studies, skin painting, other in vivo testing and any type of in vitro testing including, but not limited to, additives testing.

B. Documents concerning the identification and/or quantification of components of tobacco and components of tobacco smoke (mainstream or sidestream), ETS, cigarette additives or smoke

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condensate including, but not limited to, pyrolysis and fate studies.

C. Documents concerning the modification of tobacco, tobacco smoke (mainstream or sidestream), ETS or any smoke component for any purpose related to smoking and health. This includes, for example, changes in blending of tobacco and cigarette design or construction for the purpose of changing the composition of smoke (mainstream or sidestream), filter research, treatment of tobacco or use of tobacco substitutes.

D. Documents concerning agreements, decisions, directives, discussions or recommendations by Philip Morris or its counsel concerning whether to undertake or not undertake smoking and health research, either in the U.S. or outside the U.S.

E. Documents concerning pesticide residues in tobacco as they relate to smoking and health. This includes, but is not limited to, biological testing, residue analysis or foreign pesticide residue standards.

F. Documents concerning the ignition propensity of cigarettes.

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G. Documents concerning alternative or nonconventional cigarette designs that may be related to smoking and health. This includes documents concerning product development from initial conceptualization through decisions whether to market the alternative design, including, for example, subjective evaluations, panel testing, test marketing and other assessments concerning the marketability of such alternative designs or product development efforts.

H. Documents concerning the Council for Tobacco Research (CTR), Tobacco Industry Research Committee (TIRC), Industry Technical Committee, CTR Special Projects, Industry Research Committee, the CTR Scientific Advisory Board (SAB) and the Literature Retrieval Division (LRD). This includes, but is not limited to, documents concerning the establishment, formation or incorporation of, or Philip Morris' membership in or affiliation with, any of the listed entities.

I. Documents concerning LS, Inc. This includes, for example, documents concerning the establishment, formation or incorporation of, or Philip Morris' affiliation with LS, Inc.

J. Documents concerning The Tobacco Institute. This includes, for example, documents concerning the establishment,

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formation or incorporation of, or Philip Morris' membership in or affiliation with TI.

K. Documents concerning the funding of, establishment, formation or incorporation of, or Philip Morris' membership in or affiliation with or financial support of any corporation or entity, other than TIRC, CTR, TI, LRD and LS, Inc., which has or had any purpose relating to smoking and health or the advertising, marketing or promotion of cigarettes, including but not limited to smoking and health research or the warehousing, storage or organization of documents.

L. Documents concerning smoking and health or the advertising, marketing or promotion of cigarettes, which were exchanged or shared between Philip Morris and any of the following entities:

a. Lorillard Tobacco Company

b. R.J. Reynolds Tobacco Company

c. Brown & Williamson Tobacco Corporation

d. B.A.T. Industries, p.l.c.

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e. American Tobacco Company

f. Liggett Group, Inc.

g. Hill & Knowlton

h. T.D. Bates & Co.

i. Tiderock Corp.

j. Any tobacco or cigarette trade group or organization in England

k. Any tobacco or cigarette company in England

l. The Roper Organization

m. Minnesota Candy and Tobacco Association

n. Minnesota Convenient Stores Association

o. Minnesota Grocers Association

p. Minnesota Smokers' Rights Coalition

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M. Documents concerning diseases or conditions that have in any way been positively or negatively associated with smoking including, but not limited to, cancer, emphysema, bronchitis, chronic obstructive pulmonary disease (COPD), heart disease, Alzheimer's disease, Parkinson's disease, Buerger's disease, arteriosclerosis, or stroke. Also include documents concerning the effect of smoking on pregnancy or the fetus, respiratory irritation or the function and/or structure of the respiratory system.

N. Documents concerning the pharmacological or physiological effects of cigarette smoke (mainstream or sidestream), ETS or any components of cigarette smoke, e.g., nicotine or carbon monoxide.

O. Documents concerning any alleged health hazards of cigarette additives.

P. Documents concerning any potential or actual effort by Philip Morris to develop or market any product containing nicotine, other than conventional or nonconventional cigarettes.

III. SMOKING BEHAVIOR

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A. Documents concerning human smoking behavior including, but not limited to, why people smoke, why people quit smoking, how people smoke, moderation of smoking, ease or difficulty in quitting, and numbers or percentages of smokers who attempt to quit smoking (whether or not successfully). Include documents concerning the effects of advertising, marketing or promotion of cigarettes, tobacco industry statements, Surgeon General's reports, anti-smoking campaigns and other publicly available information on smoking behavior.

B. Documents concerning the physiological, pharmacological or behavioral responses to cigarettes, tobacco, tobacco smoke or their components (including, but not limited to, nicotine analogs or acetaldehyde) in humans or animals.

C. Documents concerning "addiction," dependence, habituation, tolerance or withdrawal.

D. Documents concerning research, testing, marketing or studies on the relationship of nicotine or alkaloids to taste, flavor, "satisfaction," subjective acceptability, or the levels of nicotine acceptable to smokers. Include documents concerning development of a nicotine-free cigarette or cigarettes with significantly reduced nicotine levels.

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IV. MANUFACTURING

A. Documents concerning monitoring, controlling, manipulating, altering, adjusting, restoring, adding, reducing, removing, increasing, decreasing or maintaining nicotine or alkaloids in tobacco, cigarette components, ingredients, or smoke. For example, include documents concerning: (1) the determination of "target" levels of nicotine or nicotine-containing additives or alkaloids; (2) monitoring, controlling, manipulating, altering, adjusting, restoring, adding, reducing, removing, increasing, decreasing or maintaining soluble levels in tobacco or cigarette components; and (3) monitoring, controlling, manipulating, altering, adjusting, restoring, adding, reducing, removing, increasing, decreasing or maintaining the content, delivery, impact, absorption, or "bioavailability" of nicotine or alkaloids in or from cigarettes or cigarette components.

B. Documents concerning efforts to breed, genetically engineer, develop or cultivate tobacco to increase or decrease nicotine or alkaloid levels.

C. Documents concerning research, testing, marketing or studies on the relationship of nicotine or alkaloids to taste, flavor, "satisfaction," subjective acceptability, or the levels of

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nicotine acceptable to smokers. Include documents concerning development of a nicotine-free cigarette or cigarettes with significantly reduced nicotine levels.

D. Documents concerning the relationship of nicotine or alkaloid levels or yields to "tar" levels or yields in cigarette smoke, except documents which report the results of routine cigarette smoke tests and documents which report the results of routine analytical smoke chemistry work.

E. Documents concerning the purchase, use or blending of tobacco that discuss or refer to the nicotine or alkaloid content of tobacco or cigarettes, the ammonia content of tobacco or cigarettes, the pH levels of tobacco or cigarettes, the "tar" to nicotine ratio of cigarette smoke, and/or the content, delivery, "impact," absorption, or "bioavailability" of nicotine or alkaloids in cigarette smoke.

F. Documents concerning the relationship between ammonia and nicotine or alkaloids.

G. Documents concerning the monitoring, controlling, manipulating, altering, adjusting, restoring, adding, reducing,

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removing, increasing, decreasing or maintaining of pH levels in smoke, cigarettes or any cigarette component.

H. Documents concerning the use of ammonia or any substance containing or releasing ammonia at any stage in the manufacture of cigarettes or blend components.

I. Documents concerning acetaldehyde, except documents which report the results of routine cigarette smoke tests and documents which report the results of routine analytical smoke chemistry work.

J. Documents concerning the relationship of ammonia to taste, flavor, "satisfaction," or the subjective acceptability of cigarettes, tobacco, cigarette components or smoke.

V. ADVERTISING, MARKETING AND PROMOTION OF CIGARETTES

A. Documents concerning strategies, methods, or objectives for the advertising, marketing, and promotion of cigarettes, whether brand-specific or otherwise. This includes specifically, and without limitation, annual or five-year plans communications to or from the Board of Directors, and a committee thereof, to or from

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management (including presentations and minutes of meetings) concerning the advertising, marketing, and promotion of cigarettes.

B. Documents concerning the development or execution of strategies, methods, or objectives for the advertising, marketing, and promotion of cigarettes, whether brand-specific or otherwise. Brand-specific includes, without limitation Marlboro, Marlboro Express, Virginia Slims and Next.) This includes, without limitation, the following types of documents:

1. Development documents, to the extent they concern strategies, methods, or objectives for the advertising, marketing, and promotion of cigarettes.

   a. Creative briefs (requests for concept or creative development transmitted, for example, to Leo Burnett Co.)

   b. Project briefs

   c. Client service reports and contact reports

   d. Production reports

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e. Media plans

f. Brand plans

g. Proposed advertisements

h. Program analyses ("analytic reports")

2. Execution documents, to the extent they concern strategies, methods, or objectives for the advertising, marketing, and promotion of cigarettes

a. Advertising ("images")

b. Documents relating to promotion (e.g. retail displays; point-of-sale (POS) materials)

c. Documents relating to continuity of programs e.g., Marlboro Country Store catalogues

d. Documents relating to event promotions

e. Documents relating to trade-incentive programs; e.g. documents concerning the

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formation of the retail "masters" and wholesale "masters" programs

f. Documents relating to direct marketing

(1) Annual plans

(2) Documents concerning the acquisition of names

(3) Documents concerning the Qualify, Update, Enhance ("QUE") program

(4) Consumer Survey Associate documents (Philip Morris dba Consumer Survey Associates)

[Note: Execution documents which merely reflect specific marketing or promotional activities (e.g., directing placement of particular displays) without referring to any strategic or other general consideration should not be collected.]

C. Documents concerning or reflecting research into strategies, methods, or objectives for the advertising,

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marketing, and promotion of cigarettes, brand-specific or otherwise, whether qualitative or quantitative, including, without limitation, the following types of documents:

1. Qualitative/Concept Development Research (research regarding initial strategies, methods, or objectives for the advertising, marketing, and promotion of cigarettes (i.e., concepts and campaigns during developmental stages)

   a. Reports from focus groups, triads, one-on-one interviews

   b. Vendors: Marketing Perceptions; Greenfield Consulting

[Note: The identification of vendors is non-exhaustive, and is intended to aid the persons performing the collection. Additional vendors may exist in most categories.]

2. Quantitative Research (compilations intended to provide projectable data for the evaluation of strategies, methods, or objectives for the

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advertising, marketing, and promotion of cigarettes).

a. Eye-tracking studies (Vendor: Perception Research Service)

b. Portfolio (recall) studies; (Vendors: Schifirm-Blocker; Marketing Information Systems, Inc. (MISI))

c. Tip-In (recall) studies; (Vendors: Gallup, Robinson)

d. Mall Intercept studies (e.g. ad-pack, name-test, packaging graphics studies) (Vendor: MISI)

e. Advertising studies (Vendors: Schifirm-Blocker, Millward-Brown)

f. Tracking Studies **(Collect only specially requested or specially designed studies; do not collect routine annual, semi-annual or other regularly generated reports)**

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(1) Trade tracking reports: Shipment data (Vendor: Management Sciences Ass'n. (MSA)); STARS data (Intenal); Retail tracking data (Vendors: Neilsen, Meyers Research)

(2) Consumer tracking reports: Telephone survey data (Vendors: Winona Research, Meyers); Household panel data (Vendors: NPD, IRI, MRCA)

g. Switching studies (Vendor: Winona Research); Quitting studies; Initiation studies

h. Market segmentation studies (product image, consumer characteristic studies) (Vendors: Landis Group; Roper Organization)

i. Market structure studies (Vendor: MISI)

j. Test-market tracking studies

(1) Attitude Awareness & Usage ("AAU") Reports; (Vendor: Winona Research)

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(2) Trier/In-Store research (include documents concerning selection of test markets) (Vendor: MISI)

(3) Image studies (Vendors: MISI, Schifirm-Blocker)

(4) Market Perception studies (Vendor: MISI)

3. Documents concerning or reflecting research into attitudes towards cigarette smoking or issues related to cigarette smoking; public opinion studies. (Vendor: Roper Organization)

4. Documents concerning or reflecting product testing. This includes, without limitation, Richmond and contract research involving blind tests, product-identified tests, and tests of competitive products. (Vendors: National Panel Diary (NPD) of Household Testing Institute (HTI), POL (Philip Morris dba Product Opinion Laboratory)

5. Documents concerning or reflecting research, whether brand-specific or otherwise, into the

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advertising, marketing, or promotion of cigarettes to identifiable market components, including, without limitation, the following:

a. Particular smoker-types (e.g. menthol, low-tar)

b. Specific age groups

c. Groups defined by gender or sexual orientation;

d. Groups defined by race or ethnicity;

e. Groups defined by their preference for competitors' products ("competitive smokers")

f. Groups defined by area or region (urban, rural, Midwest, etc.)

6. Documents concerning research into specific products of competitors, or the advertising, marketing, and promotion of specific products of competition (e.g., Joe Camel campaign)

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7. Documents concerning research into Corporate Affairs Initiatives (Accommodation program, It's the Law, Action Against Access (AAA))

D. Documents concerning the communication of programs for the advertising, marketing, or promotion of cigarettes to the sales force, to the extent such documents refer to specific strategies, methods, or objectives. These include, without limitation, the following:

1. Monthly sales plans (formerly "PPPs").

2. Trade advertising (whether or not brand-specific).

3. Promotional plan documents.

4. Retail promotion fact sheets.

E. Documents to, from, or concerning any specifically identified advertising agencies, to the extent the documents refer to specific strategies, methods, or objectives for the advertising, marketing, or promotion of cigarettes. (Notwithstanding the foregoing, collect all documents to, from or concerning Leo Burnett Co.)

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F. Documents concerning the following issues:

1. Industry or Philip Morris guidelines or codes relating to the advertising, marketing, or promotion of cigarettes

2. Decisions or discussions to refrain from certain types of advertising, marketing, or promotion of cigarettes because of issues pertaining to health and/or youth marketing.

3. Decisions by any advertising, marketing, promotional or public relations firm to refuse to undertake or to decline any project relating to the advertising, marketing, or promotion of cigarettes because of a smoking and health and/or youth issue.

4. Decisions to conduct research outside the United States concerning the advertising, marketing, or promotion of cigarettes.

5. Placement of cigarette advertising, marketing, or promotional materials at sporting or entertainment

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events, at concerts, in movies, in video games, and/or on television.

6. Philip Morris' or the tobacco industry's public and internal positions, policies and statements on advertising, marketing, and promotion of cigarettes.

7. Placement of cigarette billboards, advertising or promotional materials near schools or playgrounds.

8. Effects of point of sale advertising on people under the age of 21.

9. Studies or research concerning persons under the age of 21, including their smoking habits.

10. The advertising, marketing, and promotion of cigarettes to persons under age 21.

11. Number or percentage of smokers who switch brands.

12. Effects of anti-smoking advertising.

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13. Company efforts to prevent or discourage persons under the age of 21 from smoking cigarettes.

14. The effectiveness of warning labels.

15. A decision of Philip Morris, or one of its affiliates, to discontinue shipping cigarettes to Canada, or cease the marketing of cigarettes in Canada

16. A decision of Philip Morris to market cigarettes otherwise than in packages of 20 cigarettes.

VI. DOCUMENTS TO BE COLLECTED AND/OR IDENTIFIED SPECIALLY

A. Documents For Which Only Representative Samples Should Be Collected

For the following documents, do not at this point collect all responsive examples. Instead, collect only representative samples for further evaluation to determine the appropriate extent of collection. Be sure also to note the exact location(s) and approximate volume of these documents.

1. Otherwise responsive *routine* quality control documents concerning the monitoring of the company's and

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competitors' products and quality assurance checks of materials to be used in or on the product itself, such as leaf analysis.

2. Otherwise responsive *routine* documents concerning the processing of tobacco and the manufacturing and/or production of tobacco products.

3. Otherwise responsive *routine* documents concerning plant maintenance and operation.

4. Otherwise responsive laboratory analysis and raw data such as chromatographs, numerical tables and computer printouts.

B. Documents For Which Complete Summary Sets Should Be Collected

For the following you should collect documents sufficient to summarize the requested information by year (or longer period, if appropriate) but only one copy of such documents. For example, if information about purchases by the State government is requested, collect one set of documents that summarizes or is sufficient to calculate total sales by the State in each year for which information is available. Once a set for a given year is

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collected, however, you need not collect extra copies of documents in that set.

1. Documents concerning the purchase or sale by or to any federal, state or local governmental body or agency of tobacco or any tobacco product for any purpose whatsoever.

2. Insurance policies that may afford coverage in smoking and health lawsuits.

3. Documents concerning Philip Morris or other tobacco company sales of cigarettes in the United States and Minnesota, including the numbers of cigarettes sold, dollar amounts of sales, market share and the profit from sales.

4. Records concerning Philip Morris' and other tobacco companies' expenditures for advertising, marketing, and promotion of cigarettes in the United States and Minnesota.

C. Identify Location Only

For the following, do not collect but list location and volume on attached form.

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1. Otherwise responsive lab notebooks.

2. Cigarette advertisements of any media.

VII. DO NOT COLLECT

Do not collect the following (unless they are contained in files containing other responsive documents):

1. Documents that are strictly administrative, such as invoices, shipping notices and personnel matters, that contain no discussion of smoking and health issues or the advertising, marketing, and promotion of cigarettes.

2. Reprints of scientific publications unless a particular reprint contains handwritten notes, is an article by a Philip Morris employee or a Philip Morris sponsored author or is in a file with other smoking and health related materials.

3. Personnel information.

4. Expense reports and travel arrangements.

5. Weekly sales field reports.

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6. Documents previously copied, unless the previously copied document is associated with a document that was not previously copied and therefore must be copied to maintain accurate context and document completeness, or unless the copied document was supplemented after it was last copied.

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